

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS (DALLAS)

J-W OPERATING COMPANY, §
§
Plaintiff, §
§
vs. § CIVIL ACTION NO. 3:11-cv-00920-F
§
OILFIELD SERVICES, LLC §
§
Defendant. §

**PLAINTIFF J-W OPERATING COMPANY'S
RESPONSE TO DEFENDANT'S AMENDED MOTION TO TRANSFER VENUE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant J-W Operating Company ("J-W") and files this Response to the Amended Motion to Transfer Venue filed by defendant Oilfield Services, LLC ("Oilfield Services"), and would respectfully show the following:

Over six months after this lawsuit was filed, and after Oilfield Services entered a general denial without contesting venue and then removed this lawsuit to this Court, and after this Court entered a Scheduling Order, Oilfield Services filed a motion to transfer this matter to the Western District of Louisiana. For reasons more particularly set forth in its Memorandum in Support of this Response, J-W respectfully requests that the Court deny Oilfield Services' belated motion.

WHEREFORE, PREMISES CONSIDERED, J-W OPERATING COMPANY respectfully requests an order from this Court denying the Motion to Transfer Venue filed by defendant Oilfield Services, LLC, and for all other and further relief to which J-W may be justly in law and by equity.

Respectfully submitted,

/s/ Julie A. Walker

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**ATTORNEYS FOR PLAINTIFF
J-W OPERATING COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served upon the following parties or their counsel of record via the Court's electronic mailing system, this 26th day of December, 2011:

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/s/ Julie A. Walker

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